

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

Nashville Division

Concord Music Group, Inc. et al

Case No. 3:23-cv-01092

v.  
Anthropic PBC

Judge Waverly D. Crenshaw, Jr.

**MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to Rule 83.01 of the Local Rules of Court for the United States District Court Middle District of Tennessee, Andrew Gass hereby moves for admission to appear *pro hac vice* in the above-captioned action as counsel for Defendant Anthropic PBC.

Pursuant to 29 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct:

1. I am a member in good standing of the United States District Court for the Northern District of California. Attached is a Certificate of Good Standing from that court.

2. I am not, nor have I ever been, the subject of disciplinary proceedings by any disciplinary authority, court, or tribunal, except as provided below:

N/A

3. I have not been found in contempt by any court or tribunal, except as provided below:

N/A

4. I have not been sanctioned pursuant to 28 U.S.C. § 1927, except as provided below:

N/A

5. I have never been censured, suspended, disbarred, or denied admission or readmission by any court or tribunal, except as provided below.

N/A

6. I have not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below:

N/A

7. I understand that pursuant to Local Rule 83.01(d)(1), if I am not both a member of the Tennessee bar and admitted to the bar of this Court, local counsel must be retained. Below is the name, address, phone number, and e-mail address of local counsel retained in this matter:

Aubrey B. Harwell III  
1201 Demonbreun Street, Suite 1000, Nashville, TN 37203  
(615) 238-3526  
trey@nealharwell.com

8. I have read and am familiar with Local Rules of Court for the United States District Court Middle District of Tennessee.

9. By seeking admission to practice before this Court, I acknowledge my responsibility for compliance with all rules of this Court and confer disciplinary jurisdiction upon this Court for any alleged misconduct arising in the course of the proceeding.

Andrew Gass

/s/

Signature

Name: Andrew Gass

State where admitted and State Bar Number: California, Bar No. 259694

Business Address: 505 Montgomery Street, Suite 2000, San Francisco, CA 94111

Local Address [if different from above]:

Phone: (415) 391-0600

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\*In filing the present motion, Anthropic specifically reserves all rights to request a change of venue under 28 U.S.C. § 1404 and/or assert any and all defenses available under common law, statutes, or the Federal Rules of Civil Procedure, including, but not limited to, lack of personal jurisdiction, improper venue, lack of standing, and other applicable defenses.

**CERTIFICATE OF SERVICE**

[Include certificate of service in compliance with Local Rule 5.01 and 5.02]

See attached.

**\*\*FEE: \$150.00** [Fee may be paid through the credit card module in ECF or payment may be forwarded to the Clerk within 21 days of filing the motion. If forwarded to the Clerk, payment should be in the form of a check, cashier's check or money order payable to the Clerk, U.S. District Court, 719 Church Street, Suite 1300, Nashville, TN 37203.]

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of November, 2023, I electronically filed the foregoing Motion for Admission Pro Hac Vice with the Clerk of the Court using the CM/ECF system and served all parties of record via the CM/ECF system as indicated below:

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/s/ Aubrey B. Harwell III  
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